

REMARKS

This Application has been carefully reviewed in light of the decision of the Board Of Patent Appeals and Interferences ("Board") transmitted December 1, 2008. Claims 1-12, 14-32, and 34-105 were pending. The Board affirmed the Examiner's rejection of Claims 1-12, 14-32, and 34-105 under 35 U.S.C. § 102(e). Applicants respectfully request reconsideration and favorable action in this case.

Claim Rejections under 35 U.S.C. § 102

The Examiner rejects Claims 1-12, 14-32, and 34-105 under 35 U.S.C. § 102(e) as anticipated by U.S. Patent No. 6,711,166, which issued to Amir ("*Amir*"). Applicants cancel Claims 1-12, 14-32, and 34-105 without prejudice or disclaimer. Applicants address *Amir* with respect to new Claims 106-125.

New Claims

Applicants add new Claims 106-125, which are fully supported by the specification as originally filed. Applicants respectfully submit that various elements of these claims are not disclosed, taught, or suggested by *Amir*.

For example, *Amir* fails to show to disclose, teach, or suggest at least the following elements of independent Claim 106:

receiving, by a controller embodied in one or more client premises devices, an indication to initiate a communications session between a dumb terminal and a remote terminal using an Internet Protocol (IP) packet based network, the dumb terminal comprising a non-IP telephone;

generating, by the controller, an abstraction of at least one signaling message received from the dumb terminal, the abstraction of the at least one signaling message comprising a description of the at least one signaling message; and

translating, by the controller, the abstraction of the at least one signaling message for presentation to the remote terminal, thereby establishing the communications session between the dumb terminal and the remote terminal using the IP packet based network.

Independent Claims 113 and 120 include elements that, for reasons substantially similar to those discussed above with respect to Claim 106, are not disclosed, taught, or suggested by the cited references. Thus, for all of these reasons, Applicants respectfully

request the Examiner to consider and allow independent Claims 106, 113, and 120 and their respective dependent claims.

Conclusions

Applicants have made an earnest attempt to place this case in condition for allowance. For the foregoing reasons, and for other reasons clearly apparent, Applicants respectfully request full allowance of all pending Claims. If the Examiner feels that a telephone conference or an interview would advance prosecution of this Application in any manner, the undersigned attorney for Applicants stands ready to conduct such a conference at the convenience of the Examiner.

The Commissioner is hereby authorized to charge the required **\$810.00** fee to file a Request for Continued Examination and, to the extent necessary, charge any other required fees or credit any overpayments to **Deposit Account No. 02-0384 of Baker Botts L.L.P.**

Respectfully submitted,

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